

# EXHIBIT B

**IN RE: CAPITAL ONE CONSUMER DATA SECURITY BREACH LITIGATION**  
**Confidential Steve Schuster 30(b)(6) on 06/11/2020**

1 CONFIDENTIAL  
2 IN THE UNITED STATES DISTRICT COURT  
3 FOR THE EASTERN DISTRICT OF VIRGINIA  
4 ALEXANDRIA DIVISION  
5  
6 IN RE: CAPITAL ONE :  
7 CONSUMER DATA SECURITY : MDL NO.:  
8 BREACH LITIGATION : 1:19md2915 (AJT/JFA)  
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14 VIDEOTAPED 30(b)(6) DEPOSITION OF  
15 STEVE SCHUSTER  
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20 Thursday, the 11th day of June 2020  
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1 Q. Anything else?

2 A. As I mentioned before, we have added -- and  
3 I don't know explicitly which ones, but we have added  
4 other alarming and more analysis in GuardDuty. We  
5 have also increased as I mentioned the analysis to  
6 Zelkova and others. I would consider those belts and  
7 suspenders.

8 Q. The last sentence in this paragraph states  
9 and let me quote it again, "But you can rest assured  
10 that we will learn from this event alongside our  
11 partner and be relentless in continuing to evolve our  
12 services over time."

13 Did I read that correctly?

14 A. Yes.

15 Q. And in this sentence, Mr. Schmidt is  
16 referring to Capital One as its partner, as AWS's  
17 partner; isn't that correct?

18 A. It is correct.

19 Q. Upon learning through a text on July 20th of  
20 the data breach, did Amazon notify its other customers  
21 utilizing its cloud systems of the breach?

22 A. We were provided indications that Paige had  
23 accessed -- potentially accessed other customers using  
24 this method. And so yes, we did provide that  
25 notification.

1 Q. And how many other customers using the same  
2 method and mode of attack did Paige Thompson attack  
3 and exfiltrate data from?

4 A. So I do not know how many she exfiltrated  
5 data from. I do know that there was reference to  
6 other companies that she had been working -- excuse  
7 me -- against. I do not know the results of her work  
8 against those other customers. I had the names and  
9 knew the names of the customers from social media  
10 posts and from other information that Capital One  
11 provided us initially from her -- from her snap --  
12 Slack channel and her Git -- her Git postings.

13 And so with that we then reached out to  
14 those customers to let them know that they had also  
15 potentially been implicated or had this type of  
16 attention in their environment.

17 Q. And how many customers in total were in that  
18 universe?

19 A. The first set was 11, and then I believe we  
20 had another set that we heard through the law  
21 enforcement investigations and, in that, there was  
22 around 60.

23 Q. So in addition to Capital One, Ms. Thompson  
24 was able to get into the account s of 71 additional  
25 customers of AWS?

1           A.    I do not know the success or the failure of  
2   her ability to get into those other customers. We had  
3   information that they were a focus of her time. I do  
4   not have the information of whether she was successful  
5   or not or whether other data were actually exfiltrated  
6   or accessed.

7           Q.    Did Amazon conduct an investigation as it  
8   had with Capital One of these other 71 accounts?

9           A.    Not of all 71 accounts, no, sir. We  
10   provided notification to those customers, asked them  
11   to look for those indications that were similar to  
12   what had happened, and then offered if they wanted  
13   additional support, we offered their -- we offered to  
14   support them.

15          Q.    Why did you provide support for Capital One  
16   with that and not go -- volunteered for the other 71?

17          A.    I'm sorry, we did volunteer. We provided  
18   them notifications that we had information but they  
19   had also been made attention and asked if they wanted  
20   support or our help.

21          Q.    Did any of the 71 request Amazon's support?

22          A.    I think there were two.

23          Q.    Which two were those?

24          A.    I do not know.

25          Q.    Were those financial institutions or banks?

1 A. I do not know.

2 Q. Were any of the 71 financial institutions?

3 A. I don't know. I don't know who those  
4 customers were.

5 Q. Were any of the 71 customers, however,  
6 regardless of whether or not you know or don't know  
7 their identities, store information of customers or  
8 consumers?

9 A. I -- I -- I don't know what was -- much like  
10 with Capital One, I don't have the ability to know how  
11 their environment is set up, if the attacks were  
12 successful, or where any or even what data is stored  
13 in their environments.

14 Q. What period of time did the attacks on these  
15 71 accounts occur?

16 A. I do not know because I wasn't --

17 MR. NEWBY: Object to form. You may  
18 answer.

19 Q. (By Mr. Yanchunis) You don't know the  
20 answer to that?

21 A. I did not do the --

22 THE WITNESS: Sorry, Tyler. Go ahead.

23 MR. NEWBY: I was saying object to  
24 form. You may answer.

25 THE WITNESS: I did not do the

1 analysis for that -- for those customers.

2 I let them know that they were implicated

3 or mentioned in Paige Thompson's data.

4 Q. (By Mr. Yanchunis) So you don't know what  
5 period of time, whether it be months, days, weeks or  
6 even years of Paige Thompson's activity with regard to  
7 these 70 other -- 71 other customers of Amazon;  
8 correct?

9 A. That's correct.

10 Q. Did any of the 71 customers of Amazon  
11 provide any information following their own  
12 investigations or assessments, if they did any, of the  
13 activity of Paige Thompson?

14 A. None that I'm aware of.

15 Q. Other than 71 accounts that were -- or 71  
16 customers that we're talking about, did Amazon notify  
17 all of its other customers using its cloud-computing  
18 services of the attack by Paige Thompson of the  
19 accounts of 72 of its customers?

20 A. No. We sent no broad notification to other  
21 customers. We --

22 Q. Any reason you did not?

23 A. Well, we did do the scan we talked about  
24 earlier. We scanned for this particular piece, this  
25 particular misconfiguration and notified 280 customers

1 that they had this configuration. I do not know  
2 whether that was appropriate or not. And then these  
3 were identified through the law enforcement analysis  
4 or specific to Paige Thompson, that set of customers.

5 But we did not send broad notification to  
6 customers that didn't -- that either were not  
7 explicitly identified in Paige Thompson's activities,  
8 or explicitly identified as having this potential  
9 security misconfiguration.

10 Q. Well, but you identified through the testing  
11 of this tool that you created that there were 280  
12 customers who had misconfigurations; correct?

13 A. Yes, sir. Yes, sir, and we notified those  
14 customers.

15 Q. And law enforcement for reviews of Paige  
16 Thompson's GitHub or Slack account --

17 A. Slack.

18 Q. -- revealed the names of 72 customers that  
19 she had accessed; correct?

20 MR. NEWBY: Object to form.

21 THE WITNESS: That she was paying  
22 attention to. I do not know whether they  
23 were accessed or whether they were just  
24 scanned or what she was doing with those  
25 other customers.



1 Q. (By Mr. Yanchunis) Okay.

2 A. They were identified in her information, but  
3 I -- but I do not know how much she attacked them, if  
4 at all.

5 Q. Let's -- so you know what I'm having a  
6 problem with is why Amazon would not have notified the  
7 other 208 customers that it had identified as having  
8 misconfigurations to tell them, by the way, we've been  
9 notified by law enforcement and saw on Paige  
10 Thompson's GitHub and Slack account that she was  
11 playing around and maybe having gained in and maybe  
12 taken information out of those other accounts, so  
13 you-all ought to check that.

14 MR. NEWBY: Objection to form.

15 Q. (By Mr. Yanchunis) Why wouldn't you have  
16 told those other 208 customers to tell them they may  
17 want to check their -- their S3 buckets to see if they  
18 were the subject of infiltration and exfiltration?  
19 Any reason?

20 MR. NEWBY: Objection to form.

21 THE WITNESS: So I -- I'm obviously  
22 not communicating clearly. The 280 that we  
23 identified, we sent notifications out to  
24 them to tell them you've obviously seen the  
25 press release of what's going on with

1 Capital One. We have found an error in  
2 your configuration through our scanning and  
3 you should verify that this is established  
4 and set up as you expect it to be. That's  
5 of the 280 that we have scanned.

6 Then the other 71 that we had account  
7 information, IP addresses, and we could  
8 link to specific account names, we reached  
9 out to them more directly because this was  
10 information in Paige Thompson's data to  
11 indicate to them we have further indication  
12 that Paige Thompson was paying attention to  
13 your environment. You should look deeply  
14 at what's going on. You should know how  
15 and what happened with Capital One. By  
16 this time everybody was writing about what  
17 had happened. And we offered support and  
18 help to both populations.

19 Q. (By Mr. Yanchunis) Okay. But of the ones  
20 that were identified through law enforcement or on her  
21 GitHub and Slack account, that was 71; correct?

22 A. Correct.

23 Q. We'll make it 72; right?

24 A. Correct.

25 Q. Okay. And for those people, you told that

1 Paige Thompson might have engaged in some malfeasance  
2 in connection with their accounts; correct?

3 A. Correct.

4 Q. And in connection with the 280 that you  
5 found misconfigured misconfigurations in their  
6 account, was any of the 71 included in that 280 or is  
7 this 280 in addition to the 71?

8 A. I -- I don't have that information at hand.  
9 I can imagine -- I can imagine it was a set of  
10 customers -- and I don't know how many -- that may  
11 have had both notifications.

12 Q. And for those -- other than the 71, you did  
13 not reveal to them that for 72 customers of AWS, that  
14 Paige Thompson may have been active in those 72  
15 accounts so therefore they should check their own  
16 accounts.

17 MR. NEWBY: Objection to form. You  
18 may answer.

19 THE WITNESS: I'm going to have to ask  
20 you to ask that one more time. I'm not...

21 Q. (By Mr. Yanchunis) You didn't give the same  
22 level of information to whatever subset of 208 -- or  
23 the 280 that had not been identified by law  
24 enforcement or on Paige Thompson's Slack or GitHub  
25 account that Paige Thompson may have been involved in